

REMARKS

Applicants thank the Examiner for the very thorough consideration given the present application. Claims 1, 3, 4 and 9-22, 24, 25 and 27-31 are now pending in the present application. Claims 1, 13, 18 and 31 are independent. By this Amendment, claims 13, 18 and 31 are amended, and claim 26 is canceled. No new matter is involved.

Reconsideration of this application, as amended, is respectfully requested.

Rejections Under 35 U.S.C. § 103

Claims 1, 3, 4, 12, 19, 20, 21 and 22

Claims 1, 3, 4, 19, 20, 21 and 22 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over (1) U.S. Patent 2,881,609 to Brucken or (2) U.S. Patent 2,607,209 to Constantine in view of either (3) U.S. Patent 2,817,415 to Sykes or (2) U.S. Patent 2,311,155 to Carr. This rejection is respectfully traversed.

Initially, Applicants respectfully submit that this rejection is improper because it violates MPEP §706.02, Section I, which requires that prior art rejections be confined to the best art available, instead of applying different references where, as here, this rejection is based on four different references, all applied in the alternative. This places an undue financial burden on Applicants to have to respond to so many alternative rejections.

During patent examination the PTO bears the initial burden of presenting a *prima facie* case of unpatentability. In re Oetiker, 977 F.2d 1443, 1445, 24 USPQ2d 1443, 1444(Fed. Cir. 1992); In re Piasecki, 745 F.2d 1468, 1472, 223 USPQ 785, 788(Fed. Cir. 1984). This burden can be satisfied when the PTO presents evidence, by means of some teaching, suggestion or inference either in the

applied prior art or generally available knowledge, that would have appeared to have suggested the claimed subject matter to a person of ordinary skill in the art or would have motivated a person of ordinary skill in the art to combine the applied references in the proposed manner to arrive at the claimed invention. See Carella v. Starlight Archery Pro Line Co., 804 F.2d 135, 140, 231 USPQ 644, 647 (Fed. Cir. 1986); Ashland Oil, Inc. v. Delta Resins & Refractories, Inc., 776 F.2d 281, 293, 227 USPQ 657, 664 (Fed. Cir. 1985), cert. denied, 475 U.S. 1017 (1986); In re Rinehart, 531 F.2d 1048, 1051-1052, 189 USPQ 143, 147 (CCPA 1976).

If the PTO fails to meet this burden, then the applicants are entitled to the patent. However, when a *prima facie* case is made, the burden shifts to the applicant to come forward with evidence and/or argument supporting patentability. Patentability *vel non* is then determined on the entirety of the record, by a preponderance of evidence and weight of argument, In re Ochiai, cited above.

A prior art reference anticipates the subject matter of a claim when that reference discloses every feature of the claimed invention, either explicitly or inherently. In re Schreiber, 128 F.3d 1473, 1477, 44 USPQ2d 1429, 1431 (Fed. Cir. 1997) and Hazani v. Int'l Trade Comm'n, 126 F.3d 1473, 1477, 44 USPQ2d 1358, 1361 (Fed Cir. 1997). While, of course, it is possible that it is inherent in the operation of the prior art device that a particular element operates as theorized by the examiner, inherency may not be established by probabilities or possibilities. In re Oelrich, 666 F.2d 578, 581, 212 USPQ 323, 326 (CCPA 1981) and In re Rijckaert, 9 F.3d 1531, 1534, 28 USPQ2d 1955, 1957 (Fed. Cir. 1993).

What is alleged to be inherent must necessarily occur. The mere fact that something *may* result from a given set of circumstances is not sufficient. In re Oelrich, 212 USPQ 323, 326 (CCPA

1991). "Inherent anticipation requires that the missing descriptive material is 'necessarily present,' not merely probably or possibly present, in the prior art." Trintec Indus., Inc. v. Top-U.S.A. Corp., 295 F.3d 1292, 1295, 63 USPQ2d 1597, 1599 (Fed. Cir. 2002) (quoting In re Robertson, 169 F.3d 743, 745, 49 USPQ2d 1949, 1950-51 (Fed. Cir. 1999)).

Because the rejection is based on 35 U.S.C. § 103, what is in issue in such a rejection is "the invention as a whole", not just a few features of the claimed invention. Under 35 U.S.C. § 103, "[a] patent may not be obtained . . . if the differences between the subject matter sought to be patented and the prior art are such that the subject matter as a whole would have been obvious at the time the invention was made to a person having ordinary skill in the art to which said subject matter pertains." The determination under section 103 is whether the claimed invention as a whole would have been obvious to a person of ordinary skill in the art at the time the invention was made. See In re O'Farrell, 853 F.2d 894, 902, 7 USPQ2d 1673, 1680 (Fed. Cir. 1988). In determining obviousness, the Examiner must explain what the differences between the claimed invention and the prior art are and provide objective factual evidence to support a conclusion that it would be obvious to one of ordinary skill in the art to achieve the claimed invention, which includes those missing features.

In the second place, in rejecting claims under 35 U.S.C. § 103, it is incumbent on the Examiner to establish a factual basis to support the legal conclusion of obviousness. See In re Fine, 837 F.2d 1071, 1073, 5 USPQ2d 1596, 1598 (Fed. Cir. 1988). In so doing, the examiner is expected to make the factual determinations set forth in Graham v. John Deere Co., 383 U.S. 1, 17, 148 USPQ 459, 467 (1966), and to provide a reason why one of ordinary skill in the pertinent art would have

been led to modify the prior art or to combine prior art references to arrive at the claimed invention. Such reason must stem from some teaching, suggestion or implication in the prior art as a whole or knowledge generally available to one having ordinary skill in the art. Uniroyal Inc. v. F-Wiley Corp., 837 F.2d 1044, 1051, 5 USPQ2d 1434, 1438 (Fed. Cir. 1988), cert. denied, 488 U.S. 825 (1988); Ashland Oil, Inc. v. Delta Resins & Refractories, Inc., 776 F.2d 281, 293, 227 USPQ 657, 664 (Fed. Cir. 1985), cert. denied, 475 U.S. 1017 (1986); ACS Hospital Systems, Inc. v. Montefiore Hospital, 732 F.2d 1572, 1577, 221 USPQ 929, 933 (Fed. Cir. 1984). These showings by the Examiner are an essential part of complying with the burden of presenting a *prima facie* case of obviousness. Note, In re Oetiker, 977 F.2d 1443, 1445, 24 USPQ2d 1443, 1444 (Fed. Cir. 1992). The mere fact that the prior art may be modified in the manner suggested by the Examiner does not make the modification obvious unless the prior art suggested the desirability of the modification. In re Fritch, 972 F.2d 1260, 1266, 23 USPQ2d 1780, 1783-84 (Fed. Cir. 1992). To establish *prima facie* obviousness of a claimed invention, all the claim limitations must be suggested or taught by the prior art. In re Royka, 490 F.2d 981, 180 USPQ 580 (CCPA 1970). All words in a claim must be considered in judging the patentability of that claim against the prior art. In re Wilson, 424 F.2d 1382, 1385, 165 USPQ 494, 496 (CCPA 1970).

A showing of a suggestion, teaching, or motivation to combine the prior art references is an “essential evidentiary component of an obviousness holding.” C.R. Bard, Inc. v. M3 Sys. Inc., 157 F.3d 1340, 1352, 48 USPQ2d 1225, 1232 (Fed. Cir. 1998). This showing must be clear and particular, and broad conclusory statements about the teaching of multiple references, standing alone, are not “evidence.” See In re Dembiczak, 175 F.3d 994 at 1000, 50 USPQ2d 1614 at 1617

(Fed. Cir. 1999).

Moreover, it is well settled that the Office Action must provide objective evidence of the basis used in a prior art rejection. A factual inquiry whether to modify a reference must be based on objective evidence of record, not merely conclusory statements of the Examiner. *See In re Lee*, 277 F.3d 1338, 1343, 61 USPQ2d 1430, 1433 (Fed. Cir. 2002).

Claim 1 positively recites a combination of features including (1) a water supplying duct for supplying external water to an upper part of the inside of an inner wall of the at least one circulation duct to dehumidify the air in the at least one circulation duct primarily by flowing down the inner wall from said upper part and coming in direct contact with air received in the circulation duct, and (2) wherein the one circulation duct has a plurality of grooves with helical configurations provided at an inner wall surface thereof for prolonging a heat exchange time period of the hot and humid air by reducing the flow speed of water along the inner walls of the circulation duct.

However, this combination of features is not shown in any of the five applied references, either explicitly or inherently.

BRUCKEN AND CARR:

The Office Action asserts that Brucken's water supply duct 30 supplies external water to an upper part of the inside wall of a circulation duct to flow down the duct to dehumidify air. Actually, Brucken discloses that moisture carried by moistened air removed from the clothes is condensed from the air by a cold water spray 30 at the top of condenser tube 27 as shown, for example, in Fig. 5, where most of the water is directed directly downward into the rising air, instead of along the wall of the tube, although some water may incidentally flow down the inside of the tube.

The Office Action admits that Brucken does not disclose a grooved inside wall, as claimed.

In an attempt to remedy this deficiency of Brucken, the Office Action turns to either Sykes or Carr. However neither of these references provides the features missing from Brucken and, in fact both references teach away from modifying Brucken, as suggested.

Firstly, Carr's cooling tower is designed to cool a liquid, not to cool a moisture laden gas (see the left hand column on the first page of Carr, lines 30-35). Carr is directed to cooling the water sprayed into the tower, which is just the opposite of what is occurring in Brucken. For this reason alone, one of ordinary skill in the art would not look to Carr to modify Brucken in any way whatsoever.

Secondly, Carr does not have helical grooves in its inner wall. Carr actually discloses drip rings 24 secured to the inside of the tower, which may have a cylindrical portion 25 held to the wall by riveting, welding and brazing, and a conically inwardly extending flange 26 for directing the water inwardly away from the walls of the tower. See page 2, right hand column, lines 27-37. In other words, Carr's drip rings are not helical grooves in the inside wall of Carr, and are directed to prevent the water spray from striking the insides of the wall, which is just the opposite of the claimed invention. In other words, Carr teaches away from the claimed invention.

Thirdly, neither Brucken nor Carr discloses the claimed feature of wherein the one circulation duct has a plurality of grooves with helical configurations provided at inner wall surface thereof for prolonging a heat exchange time period of the hot and humid air by reducing the flow speed of water along the inner walls of the circulation duct. Thus, even if these references were combined, they would not result, or otherwise render obvious, the claimed invention.

BRUCKEN AND SYKES:

Sykes is even farther afield than is Carr from Brucken. Sykes deals with a device used in processes such as absorption, scrubbing, distillation, fractionalization, extraction and stripping (col. 1, lines 25-28). Sykes does not disclose a condensation tube, for example, as is claimed. Nor does Sykes disclose a tube with water flowing down the inside wall of the tube, nor does Sykes' have helically grooved interior walls. Sykes's liquid is flowed down a helical baffle while air swirls upwardly around the helical baffle. Sykes' helical baffle has ribs 22, which are used to guide liquid not toward the wall, but away from the wall and toward the innermost portion of the vessel (col. 5, lines 42-52). Sykes discloses that ribs can also be formed on the wall of the vessel 10, as shown in Fig. 3, but it is preferred that they be limited to the baffle (col. 1, lines 53-55). It is noted that Sykes discloses the shape of the baffles formed on the wall of the vessel as being applied vertically parallel to one another at the top of the vessel. Clearly, the orientation of ribs 22 on the wall of the vessel are not applied in a helical arrangement.

Thus, even if one were to modify Brucken in view of either Carr or Sykes, the modified version of Brucken would not meet or otherwise render obvious, the claimed invention.

Furthermore, because of the disparate nature of Carr and Sykes from Brucken, these references teach away from being combined with Brucken, as suggested.

CONSTANTINE AND CARR AND SYKES:

In col. 4, lines 4-20, Constantine discloses producing a water film on the inside of condenser tube 18 as it travels downward and is used to condense moisture from the moisture laden air rising in

the condenser tube 18. However, Constantine has no disclosure of the circulation duct having a plurality of grooves with helical configurations provided at an inner wall surface thereof for prolonging a heat exchange time period of the hot and humid air by reducing the flow speed of water along the inner walls of the circulation duct.

Neither Carr nor Sykes provide such a feature, for reasons discussed above. In fact, both Carr and Sykes teach away from the claimed helical groove configuration. Neither of these two secondary references show the use of spiral grooved heat exchange tubes, and neither of them includes a disclosure of flowing water down the inside thereof to cool moisture laden air.

Thus, none of the applied references disclose the concept of flowing water on the inside of a conduit with helical grooves to condense water in hot moist air. Without such a teaching, Applicants respectfully submit that the only basis for combining these applied references is based solely on Applicants' disclosure, which is improper to use as the basis for a rejection under 35 USC § 103.

Accordingly, the Office Action fails to make out a *prima facie* case of obviousness of the invention recited in claims 1, 3, 4 and 19-22.

Reconsideration and withdrawal of this rejection of claims 1, 3, 4 and 19-22 are respectfully requested.

Claim 10

Claim 10 stands rejected under 35 USC § 103(a) as being unpatentable over (1) U.S. Patent 2,881,609 to Brucken or (2) U.S. patent 2,607,209 to Constantine in view of either (3) U.S. Patent 2,817,415 to Sykes or (2) U.S. patent 2,311,155 to Carr and further in view of either (5) U.S. Patent

3,402,576 to Krupsky or (6) U.S. patent 3,216,126 to Brucken et al. ("Brucken"). This rejection is respectfully traversed.

Initially, applicants respectfully submit that this rejection is improper because it violates MPEP § 706.02, Section I, which requires that prior art rejections be confined to the best art available, instead of applying different references where, as here, this rejection is based on six different references, all applied in the alternative. This places an undue financial burden on Applicants to have to respond to so many alternative rejections.

Claim 10, as amended, depends from claim 1, which recites a combination of features neither disclosed nor suggested by the applied art. These features include, for example, a water supplying duct for supplying external water to an upper part of the inside of an inner wall of the at least one circulation duct to dehumidify the air in the at least one circulation duct primarily by flowing down the inner wall from said upper part and coming in direct contact with air received in the circulation duct, and wherein the one circulation duct has a plurality of grooves with helical configurations provided at an inner wall surface thereof for prolonging a heat exchange time period of the hot and humid air by reducing the flow speed of water along the inner walls of the circulation duct.

For this reason alone, this rejection of claim 10 does not make out a *prima facie* case of obviousness of the claimed invention.

Moreover, neither of the secondary references discloses a condenser type washer with air used to cool a condenser tube.

So even if one of ordinary skill in the art were properly motivated to modify the base reference combination in view of either Brucken or Krupsky, the modified version of the base

reference combination would neither suggest nor render obvious the claimed invention.

The Office Action also states that these features, i.e., the claimed external air supplying duct feature and external fan feature, would be obvious to provide to Brucken as “a mere extension/duplication of the teachings of Brucken (see MPEP 2144.04 REVERSAL, DUPLICATION OR REARRANGEMENT OF PARTS).”

Applicants respectfully disagree with this aspect of the rejection. This rejection completely fails to provide any objective factual evidence of any motivation to provide the claimed external air supplying duct and external fan features, and instead, improperly relies on a “*per se*” rule of unpatentability. As pointed out above, the Federal Circuit has stated, in In re Ochiai, 71 F.3d 1565, 1572, 37 USPQ2d 1127, 1133 (Fed. Cir. 1995), that “reliance on *per se* rules of obviousness is legally incorrect and must cease.”

For a *prima facie* case of obviousness to be established, the teachings from the prior art itself must appear to have suggested the claimed subject matter to one of ordinary skill in the art. See In re Rinehart, 531 F.2d 1048, 1051, 189 USPQ 143, 147 (CCPA 1976). The mere fact that the prior art could be modified as proposed by the Examiner is not sufficient to establish a *prima facie* case of obviousness. See In re Fritch, 972 F.2d 1260, 1266, 23 USPQ2d 1780, 1783 (Fed. Cir. 1992). The Examiner must explain why the prior art would have suggested to one of ordinary skill in the art the desirability of the modification. See Fritch, 972 F.2d at 1266, 23 USPQ2d at 1783-84.

The Office Action does not provide such an explanation, nor does it present objective factual evidence to support such a speculative conclusion.

Accordingly, the Office Action has not made out a *prima facie* case that claim 10 is obvious

in view of the applied references. Reconsideration and withdrawal of this rejection of claim 10 is respectfully requested.

Claims 9, 11, 12 and 17

Claims 9, 11, 12 and 17 stand rejected under 35 USC § 103(a) as being unpatentable over the art applied in the rejection of claim 1, and further in view of WIPO 93/17169 (“WIPO ‘169”) or U.S. Patent 6,282,920 to Fukumoto et al. (“Fukumoto”). This rejection is respectfully traversed.

Initially, applicants respectfully submit that this rejection is improper because it violates MPEP § 706.02, Section I, which requires that prior art rejections be confined to the best art available, instead of applying different references where, as here, this rejection is based on six different references, all applied in the alternative. This places an undue financial burden on Applicants to have to respond to so many alternative rejections.

Moreover, Applicants respectfully submit that claim 1, from which claims 9, 11 and 17 depend, is not rendered obvious by the art applied in the rejection of claim 1, and WIPO ‘169 or Fukumoto, is not applied to remedy the deficiencies in the reference combination applied in the rejection of claim 1.

Accordingly, even if one of ordinary skill in the art were motivated to modify the aforementioned reference combination used to reject claim 1, the resulting modified version of that reference combination would neither suggest nor render obvious the claimed invention.

Reconsideration and withdrawal of this rejection of claims 9, 11, 12 and 17 are respectfully requested.

Claims 13-15, 24, 25 and 31

Claims 13-15, 24, 25 and 31 stand rejected under 35 USC § 103(a) as being unpatentable over Japan 11-128594 (“Japan ‘594”) in view of either U.S. Patent 4,154,003 to Muller or U.S. Patent 2,451,692 to Pugh. This rejection is respectfully traversed.

Initially, applicants respectfully submit that this rejection is improper because it violates MPEP § 706.02, Section I, which requires that prior art rejections be confined to the best art available, instead of applying different references where, as here, this rejection is based on three different references, applied in the alternative. This places an undue financial burden on Applicants to have to respond to so many alternative rejections.

Independent claims 13 and 31, as amended, patentable define over the applied art. Claim 13, as amended positively recites a combination of features including a tub cover placed on the first tub having a flow passage around the circumference of the second tub for discharging the external water to the inner walls of the first tub to dehumidify air in the first tub during the drying operation. Claim 31, as amended positively recites a combination of features including a device placed on the first tub that discharges external water around the circumference of inner walls of the first tub to dehumidify air in the first tub during the drying operation. Support for these amendments is found, for example, in Figs. 4 and 5, and in the portions of the specification that describe these figures.

None of the applied references discloses or suggests these claimed combinations of features.

Accordingly, the Office Action does not make out a *prima facie* case of unpatentability of claims 13-15, 24, 25 and 31.

Reconsideration and withdrawal of this rejection of claims 13-15, 24, 25 and 31 are respectfully requested.

Claim 16

Claim 16 stands rejected under 35 USC § 103(a) as being unpatentable over the art applied in the rejection of claim 13, and further in view of Fukumoto. This rejection is respectfully traversed.

Applicants respectfully submit that claim 13, from which claim 16 depends, is not rendered obvious by the art applied in the rejection of claim 13, and Fukumoto, is not applied to remedy the deficiencies in the reference combination applied in the rejection of claim 13.

Accordingly, even if one of ordinary skill in the art were motivated to modify the aforementioned reference combination used to reject claim 13, the resulting modified version of that reference combination would neither suggest nor render obvious the claimed invention.

Reconsideration and withdrawal of this rejection of claim 16 are respectfully requested.

Claim 18

Claim 18 stands rejected under 35 USC § 103(a) as being unpatentable over either UK 2,075,559 (“UK ‘599”) or Fukumoto in view of either U.S. Patent 6,578,627 to Liu et al. (“Liu”) or U.S. Patent 1,920,313 to Mautsch. This rejection is respectfully traversed.

Applicants respectfully submit that the Office Action fails to provide objective factual evidence that one of ordinary skill in the art would have proper motivation to modify either UK ‘599 or Fukumoto to provide a single cooling fin for multiple circulation ducts passing therethrough to

dehumidify air in the circulation ducts. The only evidence presented in this regard are a vortex generator patent to Liu and a heat exchange radiator/evaporator patent to Mautsch, neither of which have been shown to be involved with the situation present in Fukumoto.

Neither UK '599 nor Fukumoto discloses a source of cool air to effectively cool a finned condensation duct. All that Fukumoto discloses is a washer-dryer with a condensation duct that is inside of a washing machine with no moving air to effectively cool the condensation duct, which has cooling means present already. UK '599 does use a fan 10 to cool its condenser 6.

Applicants respectfully submits that one of ordinary skill in the art would not be motivated to go to the trouble and expense of adding a single heat fin to multiple condensation ducts (wherever they may be in Fukumoto, and wherever they may be in UK '599, which shows a single cooling coil 9), as claimed, especially when Fukumoto already has an efficient means, e.g., water, to cool its condensation duct, and especially when UK '599 uses air from blower 10 to cool its coil. To say that it would be obvious to do so is mere speculation, and it is not proper to base a rejection under 35 USC §103 on speculation.

Moreover, just because it is possible to do something, does not mean that it is obvious to do so, and the citation of two widely disparate generic heat exchange references do not provide convincing evidence that one of ordinary skill in the art would be properly motivated to modify Fukumoto or UK '599, neither of which shows any need to do so.

Additionally, claim 18 is amended to positively recite a combination of features, including wherein the one circulation duct has a plurality of grooves with helical configurations provided at an

inner wall surface thereof for prolonging a heat exchange time period of the hot and humid air by reducing the flow speed of water. None of the applied references disclose or suggest this feature.

Accordingly, the office Action fails to make out a *prima facie* case of obviousness of claim 18.

Reconsideration and withdrawal of this rejection are respectfully requested.

Claim 26

Claim 26 stands rejected under 35 USC § 103(a) as unpatentable over the art applied in the rejection of claim 18 and further in view of Carr or Sykes. This rejection is respectfully traversed as moot because claim 26 is canceled.

Claims 27 and 28

Claims 27 and 28 stand rejected under 35 USC § 103(a) as being unpatentable over the prior art applied in the rejection of claim 18 in view of Japan '594. This rejection is respectfully traversed.

Claim 18, upon which claim 26 depends, patentably defines over Fukumoto and UK '599 for reasons discussed above. So, even if one of ordinary skill in the art were properly motivated to modify Fukumoto/UK '599 - Liu/Mautsch, as suggested, the resulting modified version of UK '599/Fukumoto-Liu/Mautsch would not result in, or render obvious the claimed invention.

Additionally, the Office Action fails to make out a *prima facie* case that one of ordinary skill in the art would be properly motivated to modify the base reference combinations, as suggested, in

view of Japan '594, for reasons presented above with respect to the traversal of the rejection of claims 13, 24 and 25.

Accordingly, the office Action fails to make out a *prima facie* case of obviousness of claims 27 and 28.

Reconsideration and withdrawal of this rejection are respectfully requested.

Claims 29 and 30

Claims 29 and 30 stand rejected under 35 USC § 103(a) as being unpatentable over the prior art applied in the rejection of claim 1, further in view of Japan '594. This rejection is respectfully traversed.

Claims 29 and 30 depend from claim 1, which recites a combination of features neither disclosed nor suggested by the applied art. These features include, for example, a water supplying duct for supplying external water to an upper part of the inside of an inner wall of the at least one circulation duct to dehumidify the air in the at least one circulation duct primarily by flowing down the inner wall from said upper part and coming in direct contact with air received in the circulation duct, and wherein the one circulation duct has a plurality of grooves with helical configurations provided at an inner wall surface thereof for prolonging a heat exchange time period of the hot and humid air by reducing the flow speed of water along the inner walls of the circulation duct.

Moreover, Japan '594 is not applied to remedy these shortcomings in the base reference combination. So, even if one of ordinary skill in the art were properly motivated to modify the base reference combination based on Japan '594, the modified version of the base reference combination

would not result in, or otherwise render obvious, the claimed invention.

For this reason alone, this rejection of claims 29 and 30 does not make out a *prima facie* case of obviousness of the claimed invention.

Furthermore, with respect to claim 30, Japan '594 has no disclosure of the recited flow passage having a plurality of water spraying holes disposed on a bottom portion of the tub cover and arranged at fixed intervals for uniformly spraying the water in the passage onto the inner walls of the first tub. For this additional reason, the Office Action fails to make out a *prima facie* case of obviousness of this claimed invention.

Reconsideration and withdrawal of this rejection of claims 29 and 30 are respectfully requested.

Conclusion

All the stated grounds of rejection have been properly traversed and/or rendered moot. Applicants therefore respectfully request that the Examiner reconsider all presently pending rejections and that they be withdrawn.

It is believed that a full and complete response has been made to the Office Action, and that as such, the Examiner is respectfully requested to send the application to Issue.

In the event there are any matters remaining in this application, the Examiner is invited to contact Robert J. Webster, Registration No. 46,472 at (703) 205-8076 in the Washington, D.C. area.

Reply to Office Action dated April 6, 2007
Appl. No. 10/052,553

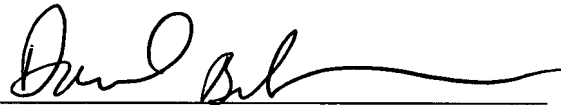
Art Unit 1746
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If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies, to charge payment or credit any overpayment to Deposit Account No. 02-2448 for any additional fees required under 37 C.F.R. §§ 1.16 or 1.17; particularly, extension of time fees.

Date: October 5, 2007

Respectfully submitted,

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